

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS**

**CIVIL ACTION NO.: 04-30172-MAP**

**ROBERT DADE,**  
**Plaintiff**

**v.**

**BOLAND BUILDERS, INC., THOMAS**  
**M. BOLAND, STUART JONES AND**  
**MARY ROSE JONES,**  
**Defendants**

)  
)  
)  
)  
) **PLAINTIFF'S MOTION TO EXTEND**  
) **SCHEDULING ORDER**

NOW COMES the Plaintiff, Robert Dade, and moves this Honorable Court to extend the Scheduling Order for the taking of depositions to October 31, 2005, and to reschedule the October 5, 2005 status conference. As grounds therefore, Plaintiff states:

1. Co-counsel for Plaintiff, Mary Patryn, will be shortly be going out on medical leave for an indefinite period of time.
2. Co-counsel for Plaintiff, Jack St. Clair, has asked Attorney John Cvejnovich (undersigned) to appear and assist in pursuing this suit.
3. Attorney Cvejnovich received this case on Tuesday, September 13, 2005.
4. There are 4 depositions scheduled; two will be taken September 23 (Defendants Stuart Jones and Mary Rose Jones), and two, Plaintiff Dade and Defendant Boland) have been scheduled, but there are scheduling conflicts and the parties require an additional thirty (30) days to complete them.
5. There is a further status conference October 5 at 2:00 p.m., but Attorney Cvejnovich is scheduled to argue three Summary Judgment Motions on that date and at that time in Hampden County Housing Court, Civil Action Nos: 02-321, 02-322 and 03-94.

WHEREFORE, the Plaintiff respectfully requests that this Motion be allowed.

THE PLAINTIFF  
ROBERT DADE

By: 

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ASSENTED TO:

  
Attorney Nancy Frankel Pelletier

  
Attorney Daniel Rider

CERTIFICATE OF SERVICE AND COMPLIANCE

I certify that on 9/19/05 I served the within document, within the time standards provided therefor, on the parties to this action by mailing a copy, postage prepaid, to all counsel of record.

  
John A. Cvejnovich